FILED IN THE U.S. DISTRICT COURT EASTERN DISTRICT OF WASHINGTON

SEP 0 4 2021

SEAN F. MCAVOY, CLERK SPOKANE, WASHINGTON

Vanessa R. Waldref

United States Attorney

Eastern District of Washington

3 | Michael L. Vander Giessen

Assistant United States Attorney

Post Office Box 1494

Spokane, WA 99210-1494

Telephone: (509) 353-2767

7 8

1

2

4

5

6

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WASHINGTON

9

UNITED STATES OF AMERICA,

10

11

12

13

14

15

16

17

18

19

2021

22

23

2425

26

27

28

FOR THE EASTERN DISTRICT OF WAS

Plaintiff,

V.

RONALD LEE VAN NOTE II,

Defendant.

INDICTMENT 4:24-CR-6023-MKD-1

Vio: 49 U.S.C. §§ 46507(2), 46506(1), 18 U.S.C. § 2242(3) Threat to Commit Sexual Abuse on an Aircraft (Count 1)

> 18 U.S.C. § 113(a)(5), 49 U.S.C. § 46506(1) Simple Assault on an Aircraft (Count 2)

The Grand Jury charges:

COUNT 1

On or about May 18, 2024, the Defendant, RONALD LEE VAN NOTE II, being an individual on an aircraft in the special aircraft jurisdiction of the United States, to wit: Allegiant Air flight number 2267, which originated from Mesa, Arizona, and landed in Pasco, Washington, in the Eastern District of Washington, did, in flight, threaten to engage in a sexual act with C.R.G. without C.R.G.'s consent, to include doing so through coercion, and the Defendant had the apparent

determination and will to carry out the threat, in violation of 49 U.S.C. §§ 46507(2) and 46506(1), and 18 U.S.C. § 2242(3).

COUNT 2

On or about May 18, 2024, the Defendant, RONALD LEE VAN NOTE II, being an individual on an aircraft in the special aircraft jurisdiction of the United States, to wit: Allegiant Air flight number 2267, which originated from Mesa, Arizona, and landed in Pasco, Washington, in the Eastern District of Washington, did, in flight, assault C.R.G. by willfully and intentionally touching and making physical contact with C.R.G. in an offensive manner without justification or excuse, in violation of 18 U.S.C. § 113(a)(5) and 49 U.S.C. § 46506(1).

DATED this _____ day of September, 2024.

A TRUE BILL

Vanus Willey
Vanessa R. Waldref
United States Attorney

Michael L. Vander Giessen

Assistant United States Attorney